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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GARNETT A. GEBHARDT,
Plaintiff,

v.

STEVEN CHU, SECRETARY, UNITED
STATES DEPARTMENT OF ENERGY,
and NORTHROP GRUMMAN CORP.,

Defendants.

Case No. CV-10-2807 (MEJ)

**STIPULATION AND PROPOSED ORDER
EXTENDING DEADLINE FOR
MEDIATION**

Judge: Hon. Maria-Elena James
Complaint Filed: June 25, 2010

1 All parties, by and through their attorneys of record, hereby stipulate as follows:

2 WHEREAS, this Court entered an Order on February 4, 2011, referring the Parties to
3 court-sponsored mediation, and issued a Notice on February 15, 2011, appointing Linda McSweyn
4 as Mediator;

5 WHEREAS, the Parties are required to complete mediation on or before May 5, 2011,
6 pursuant to ADR L.R. 6-4;

7 WHEREAS, the Parties have collectively participated in two telephonic conference
8 calls, and several others independently, with the Mediator to resolve pending discovery issues and to
9 discuss a timeline for moving the case forward as expeditiously as possible;

10 WHEREAS, the Parties have diligently pursued, but not yet completed, the exchange
11 of written discovery and the depositions of key witnesses;

12 WHEREAS, the Parties agree that conducting any mediation prior to the completion
13 of said discovery and depositions would impair the chances of a productive mediation and possible
14 settlement;

15 WHEREAS, the Parties jointly request that the Court extend the deadline by which
16 mediation is to be completed;

17 WHEREAS, the Parties agree that extending the deadline for mediation would serve
18 the interests of judicial economy and not cause any prejudice or interfere with any other court-
19 imposed deadlines; and

20 WHEREAS, the Parties have scheduled mediation for the week of July 18, 2011;

21 THEREFORE IT IS HEREBY STIPULATED by and between the Parties, through
22 their respective counsel, that:

23 1. The deadline for the Parties to complete mediation shall be extended from
24 May 5, 2011 until July 29, 2011.

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26 ///

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28 ///

1 Dated: April 15, 2011

BRYAN SCHWARTZ LAW

2
3 /s/ Bryan Schwartz

4 Bryan Schwartz, Bar No. 209903
Attorney for Plaintiff

5 Dated: April 15, 2011

LITTLER MENDELSON
A Professional Corporation

8 /s/ Shannon M. Gibson

9 Shannon M. Gibson, Bar No. 256634
Attorneys for Defendant
Northrop Grumman Systems Corp.

10
11 Dated: April 15, 2011

MELINDA HAAG
United States Attorney

13 /s/ Abraham A. Simmons

14 Abraham A. Simmons, Bar No. 146400
Assistant United States Attorney
Attorneys for Federal Defendant

16 **ORDER**

17 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the Parties' Stipulation,
18 above, is approved and adopted as the Order of this Court, as follows:

19 1. The deadline by which the Parties must complete mediation shall be extended from
20 May 5, 2011, until July 29, 2011.

21 **IT IS SO ORDERED.**

22 Dated: April 18, 2011

23
24 
25 Maria-Elena James
CHIEF UNITED STATES MAGISTRATE JUDGE

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